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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE BECTON, DICKINSON AND
COMPANY STOCKHOLDER
DERIVATIVE LITIGATION

Master File No. 2:20-cv-15474-SRC-
CLW

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

COME NOW plaintiffs Jeff Schranz and Ronald Jankowski (collectively, "Plaintiffs"), by counsel, pursuant to Rule 23.1(c) of the Federal Rules of Civil Procedure and upon the Stipulation of Settlement dated June 5, 2025 (the "Stipulation"),¹ and hereby move the Court for entry of an order in the form attached

¹ The Stipulation is being filed contemporaneously herewith as Exhibit 1 attached to the Declaration of Shane P. Sanders in Support of Plaintiffs' Unopposed Motion for

as Exhibit B to the Stipulation entitled [Proposed] Preliminarily Approval Order ("Preliminary Approval Order"): (1) granting preliminary approval of the proposed Settlement on the terms set forth in the Stipulation; (2) approving the proposed method of dissemination and the substance and form of the Notice of Pendency and Proposed Settlement of Stockholder Action and the Summary Notice of Pendency and Proposed Settlement of Stockholder Action (Exhibits B-1 and B-2 to the Stipulation); and (3) scheduling the date for the Settlement Hearing.

The parties' proposed Preliminary Approval Order includes blanks for the date and time of the Settlement Hearing, which the Court must complete to commence the proposed settlement approval proceedings. In the event the Court preliminarily approves the settlement, Plaintiffs request the following schedule:

The Company shall cause publication of the Summary Notice in <i>Investors' Business Daily</i> or similar online publication; the Company shall post the Notice and Stipulation (including exhibits) on the Company's website; the Company shall file a Current Report on Form 8-K with the SEC attaching the Notice	No later than ten (10) business days after the Court's entry of the Preliminary Approval Order
Plaintiffs file their papers in support of final approval of Settlement and Fee and Expense Amount and service awards	No later than twenty-one (21) days prior to the date of the Settlement Hearing
Defendants' Counsel file affidavit or declaration confirming timely dissemination of the Notice and Summary Notice	No later than thirty (30) days prior to the date of the Settlement Hearing

Preliminary Approval of Settlement. Unless otherwise stated, all capitalized terms used herein shall have the same meanings as set forth in the Stipulation.

Last day for Current BD Stockholders to file and serve comments or objections	No later than fourteen (14) days prior to the date of the Settlement Hearing
Plaintiffs' reply/response to any comments or objections	No later than seven (7) days prior to the date of the Settlement Hearing
Settlement Hearing	A date to be set at the Court's convenience, not less than sixty (60) calendar days after Preliminary Approval Order

Many of the dates for the events set forth above are tied either to the entry of the proposed Preliminary Approval Order or to the Settlement Hearing date, which the Parties respectfully request be scheduled at least sixty (60) calendar days after the entry of the Preliminary Approval Order or at a later date convenient for the Court. If this schedule is not convenient for the Court, the Parties request that the Court utilize similar time intervals for the events in completing the proposed Preliminary Approval Order.

Plaintiffs' motion is made pursuant to Federal Rule of Civil Procedure 23.1, and is based upon the Stipulation, the accompanying memorandum of law, all pleadings and papers filed in this action, and any such additional evidence or argument as may be required by the Court. For the reasons set forth in the Stipulation and the accompanying memorandum, Plaintiffs respectfully request that the Court find that the proposed Settlement merits preliminary approval.

Dated: June 6, 2025

Respectfully submitted,

HERMAN JONES LLP

s/ Serina M. Vash

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Co-Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

s/ Serina M. Vash
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